

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR. No. 20mj081

TERICA ELLIS,

Defendant.

MOTION TO CONTINUE

COMES NOW, Defendant, Terica Ellis, by and through her Attorney of Record, Scott Hall, and would respectfully ask this Honorable Court to continue the detention hearing currently set August 25, 2020 at 4:00pm based on the following:

- I. Counsel needs additional time to prepare and meet with Defendant in person.
- II. Counsel has zoom conferenced with Defendant at Mason but needs an in-person face to face meeting. Counsel has been advised by Mason that Defendant is currently being quarantined.
- III. Counsel has communicated with AUSA Michelle Kimbril-Parks and is working to obtain audio recordings of Defendant and FBI agents. These recordings were made shortly after Defendant's arrest in Memphis. These recordings may contain information pertinent to Defendant's need to waive her detention hearing and removal hearing.
- IV. Counsel has had conversations with the AUSA from the Eastern District of Missouri as well as Defendant's court appointed Federal Defender from the Eastern District

and based on those conversations counsel needs additional time to prepare and gather more information

- V. Counsel has spoken to AUSA Michelle Kimbril-Parks and she has no objection to the foregoing request for a continuance.
- VI. Counsels is asking for at least a week continuance.

WHEREFORE, PREMISIES CONSIDERED, Defendant would respectfully ask this Honorable Court to continue this matter.

Respectfully submitted,

/Scott Hall

Scott Hall
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CERTIFICATE OF SERVICE

I, Scott Hall, hereby certify that a true and accurate copy of the foregoing Motion has been electronically delivered to Assistant United States Attorney Michelle Kimbril-Parks, at 170 North Main 8th floor, Memphis, TN 38103 on this the 25th day of August 2020.

/Scott Hall

Scott Hall